

07 CV 2683 (BSJ)(AJP)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Jane Best-Simpson,

Plaintiff,

-against-

NEW YORK ORGAN DONOR NETWORK, ELAINE BERG,
Individually and in her Professional Capacity, MICHELE
CLAYTON LUCAS, *Individually and in her Professional Capacity*,
Julia Rivera, *Individually and in her Professional Capacity* and
Martin Woolf *Individually and in his Professional Capacity*,
ROBERT GOSSEEN, GALLAGHER, GOSSEEN, FALLER &
CROWLEY, THE NEW YORK CITY COMMISSION ON
HUMAN RIGHTS, PATRICIA GATLING, *Individually and in her
Professional Capacity*; MR. RAYMOND WAYNE, *Individually and
in his Professional Capacity*; MS. LANNY ALEXANDER,
Individually and in her Professional Capacity and MR. CLIFF
MULQUEEN, *Individually and in his Professional Capacity*,

Defendants.

**MEMORANDUM OF LAW IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS**

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